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20 Solar Trust of America, LLC, Solar Millennium, Inc.,
21 CA I-10 Solar, LLC, Palo Verde Solar I, LLC,
22 Palo Verde Solar II, LLC, Blythe Solar Power Project
23 Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
24 Blythe Solar Power Project Unit 3, LLC and
25 Blythe Solar Power Project Unit 4, LLC*

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 MMR GROUP, INC.,
20 MMR POWER SOLUTIONS, LLC and
21 SOUTHWESTERN POWER GROUP II, LLC,

22 Plaintiffs,

23 vs.

24 STA DEVELOPMENT, LLC (F/K/A SOLAR
25 MILLENNIUM, LLC), SOLAR TRUST OF
26 AMERICA, LLC, SOLAR MILLENNIUM AG,
27 SOLAR MILLENNIUM, INC., CA I-10
28 SOLAR, LLC, PALO VERDE SOLAR I, LLC,
SOLAR VERDE SOLAR II, LLC, BLYTHE
SOLAR POWER PROJECT UNIT 1, LLC,
BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT
UNIT 3, LLC AND BLYTHE SOLAR POWER
PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**SECOND STIPULATION TO
EXTEND DEFENDANTS' TIME TO
RESPOND TO AMENDED
COMPLAINT AND [PROPOSED]
ORDER**

**The Honorable Judge
Edward M. Chen**

STIPULATION

2 Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
3 SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA
4 DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
5 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
6 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
7 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
8 POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request
9 that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
10 filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
11 by one week from November 14, 2011 to November 21, 2011.

12 On November 4, the parties requested, and this Court granted, a one-week extension of
13 time for Defendants to respond to the Amended Complaint from November 7 to November 14,
14 2011 because the parties were in advanced stages of settlement discussions. The parties have
15 made significant progress in settlement discussions during the last week and expect to execute a
16 settlement agreement forthwith. Because the parties ask only for another one-week extension, the
17 parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial
18 economy, the parties therefore request that Court extend the STAD Defendants' time to respond
19 to the Amended Complaint by one week from November 14, 2011 to November 21, 2011.

1 Dated: November 11, 2011
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MILBANK, TWEED, HADLEY & McCLOY LLP

3 By: /s/ Aaron Renenger
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Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,
Blythe Solar Power Project Unit 3, LLC and
Blythe Solar Power Project Unit 4, LLC
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14 Dated: November 11, 2011
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**WATT, TIEDER, HOFFAR
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16 By: /s/ Nicholas A. Merrell
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Solutions, LLC and Southwestern Power Group II, LLC
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT COURT JUDGE